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Attorneys for Project Disbursement Group, Inc.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEVADA

In re:

USA COMMERCIAL MORTGAGE
COMPANY,

Debtor.

BK-06-10075-lbr
Chapter 11

DECLARATION IN SUPPORT OF
APPLICATION FOR AN ORDER
SHORTENING TIME TO HEAR
EMERGENCY MOTION REGARDING
PROJECT DISBURSEMENT GROUP,
INC.'S DISBURSEMENT OF INTEREST
PAYMENTS TO DEBTOR

Date: OST Requested

Time: OST Requested

Matthew Q. Callister of the Law Firm of Callister & Reynolds, attorney for Project Disbursement Group, Inc. ("PDG"), under penalties of perjury, hereby declares on this 23rd day of May, 2006 that:

1. An Emergency Motion Regarding PDG's Disbursements of Interest Payments to Debtor (the "Motion") has been filed by PDG. The Motion requests guidance and that the Court enter an order directing PDG to continue making interest payments from the interest reserve portions of certain loans which are serviced by the Debtor (the "Interest Payments"), to retain the funds, directing PDG to make the Interest Payments to some other third party who will hold the Interest Payments until further order by this Court, or file a motion to interplead the

1 funds into this Court's registry.

2 2. PDG and Debtor have entered into a Stipulation and Interim Order in which PDG
3 continues to make the Interest Payments an funds for construction (the "Construction Funds")

4 3. PDG has received numerous requests from various loan investors to cease making
5 the Interest Payments to Debtor because of a fear that Debtor will not pay the investors their
6 share of any Interest Payments made.

7 4. There is a substantial likelihood that PDG will be damaged without an order from
8 this Court directing to whom PDG should disburse the Interest Payments because various loan
9 investors may seek to hold PDG liable for disbursing the Interest Payments to Debtor.

10 5. PDG is requesting that the Motion be heard as soon as possible to prevent any
11 damage to PDG, Debtor, or investors.

12 6. No known party opposes hearing the Motion on a expedited basis on shortened
13 time.

14 DATED this 23rd day of May, 2006.

15
16 /s/ Matthew Q. Callister\
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19 Attorneys for PDG
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